

# EXHIBIT 18

Case:17-03283-LTS Doc#:22488 Filed:10/03/22 Entered:10/04/22 16:12:03 Desc: Main  
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**REPLY TO OMNIBUS OBJECTION**

[stamp:] RECEIVED & FILED  
2022 OCT - 3 PM [illegible]  
CLERK'S OFFICE  
U.S. DISTRICT COURT  
SAN JUAN, P.R.

I. Contact Information

Name: Mildred Enid Peralta Peralta Vazquez

Mailing Address: Calle 113 BO-12, Jardines de Country Club, Urb.  
Carolina, Puerto Rico 00983

Contact Phone: (787) 368-8164- cell.

II. Caption

- A. Clerk's Office  
United States District Court  
Room 150 Federal Building  
San Juan, Puerto Rico 00918-1767
- B. Commonwealth of Puerto Rico, et al. (Debtors)
- C. Docket Number: 17BK3283- LTS
- D. Omnibus Objection regarding amounts not paid by the Commonwealth of Puerto Rico:

Proof of claim numbers:

#49762 - Act #89 - Romerazo - Effective July 1, 1995.

#94057 - June 6, 2008 Pay Scale Act – Step Increases.

#96621 - Act #96 (2002) by Dr. Pedro Rosselló - effective July 2002.

Act #164 (2004) by Ms. Sila Calderón - effective January 2004.

III. The court should not grant the Omnibus Objection, because these amounts are owed based on the following laws passed by the government of the Commonwealth of Puerto Rico:

Act 89 Romerazo - Effective July 1, 1995

June 6, 2008 Pay Scale Act – Step Increases

Act #96 (2002) by Dr. Pedro Rosselló - Effective July 2002

Act #164 (2004) by Ms. Sila M. Calderón - Effective January 2004

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IV. Supporting Documentation

Enclosed are documents evidencing the years of service with the Puerto Rico Housing Finance Authority, formerly a subsidiary of the Government Development Bank for Puerto Rico, from **November 17, 1997**, through **December 31, 2021**. I ended work as Legal Secretary with the Puerto Rico Housing Finance Authority. I am filing a claim under the applicable laws covering these years of service.

Enclosed are documents as evidence for this claim:

- (a) Certification - Employment and salary
- (b) Letter dated December 17, 2021, regarding separation from employment due to illness.

Due to the recent emergency situation due to earthquakes, Covid-19 Pandemic, Monkey Pox in Puerto Rico, etc., the responses are being sent on this date. If you need additional information or documents, please contact the undersigned.

On this date, August 3, 2022, in Carolina, Puerto Rico.

Mildred Enid Peralta Vázquez  
Printed name

[Signature]

\_\_\_\_\_  
Signature

P.S. My claim is based on some laws that were signed during the years mentioned. I have always been an employee of a government agency; therefore, I consider that I am entitled to these raises.

- c: 1. **Clerk's Office United States District Court**
- 2. Counsel for the Oversight Board Prosker Rose LLP
- 3. Counsel for the Creditor's Committee Paul Hastings LL



ESTADO LIBRE ASOCIADO DE

(a)

[Coat of arms]

COMMONWEALTH OF  
**PUERTO RICO**

Housing Finance Authority of Puerto Rico

SUBSIDIARY OF THE GOVERNMENT DEVELOPMENT BANK FOR PUERTO RICO

## CERTIFICATION

I hereby certify that Mrs. Mildred E. Peralta Vázquez, social security number XXX-XX-5627, is a regular employee of the Puerto Rico Housing Finance Authority, a subsidiary of the Government Development Bank for Puerto Rico, since November 17, 1997. She is currently working as a Legal Secretary, in a position of trust, and earns a gross monthly salary of \$3,131.98.

In San Juan, Puerto Rico, on September 23, 2013.

[Signature]

Marine Linx Comas Torres

Human Resources Management Manager

PO Box 71261  
San Juan, PR 00936-8461

Barbosa Ave. 606  
Juan C. Cordero Building  
Río Piedras, PR 00919-0345  
Telephone (787) 765-7577

[Logo]  
**BGF**

**PUERTO RICO HOUSING  
FINANCE AUTHORITY**  
SUBSIDIARY OF THE GOVERNMENT DEVELOPMENT  
BANK FOR PUERTO RICO

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(b)

[logo] **GOVERNMENT OF PUERTO RICO**  
PUERTO RICO HOUSING FINANCE AUTHORITY

Via e-mail: [enimil2007@yahoo.com](mailto:enimil2007@yahoo.com)

December 17, 2021

Mrs. Mildred Peralta Vázquez  
Legal Secretary

Dear Ms. Peralta:

We hope you are well. By way of a letter dated December 1, 2021, we informed you that on December 1, 2020, you went on sick leave and on March 31, 2021, we informed you that you had been authorized Special Leave Without Pay for health reasons from March 16, 2021, through December 1, 2021, while processing non-occupational disability benefits claims under SINOT and long-term disability under Metlife. Subsequently, SINOT granted you benefits retroactive to December 1, 2020, so that your 360-calendar day employment reserve entitlement to such status expired on November 25, 2021. Subsequently, on July 28, 2021, Metlife approved your application for long-term disability benefits. Most recently, on November 22, 2021, you sent us notice of your disability approval from Social Security. It therefore appears from the medical information in our records that you are currently totally and permanently unable to work.

Article XIX, Section 1, Paragraph A of the Collective Bargaining Agreement provides, among other causes, that a Special Leave of Absence without Pay may be authorized for a period not to exceed one (1) year:

"When the employee's health is seriously impaired, and he/she has exhausted all accrued sick and vacation leave balances."

Said letter summoned you to the Informal Hearing held on December 8, 2021, at 10:30 a.m. where you were represented by Mrs. Maria Ruiz, Secretary General of the UTBV. At the hearing we informed you that due to the Authority's operational needs, the fact that the employment reserve year under SINOT expired on November 25, 2021, and in light of the information recently provided by Metlife and Social Security, it had been validated that you are totally and permanently disabled so that since there was no reasonable expectation that you could

Letter of termination of leave of absence of salary and employment Mrs. Mildred Peralta Vázquez  
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return to work, we informed you of the Authority's intention to terminate your employment, effective December 31, 2021.

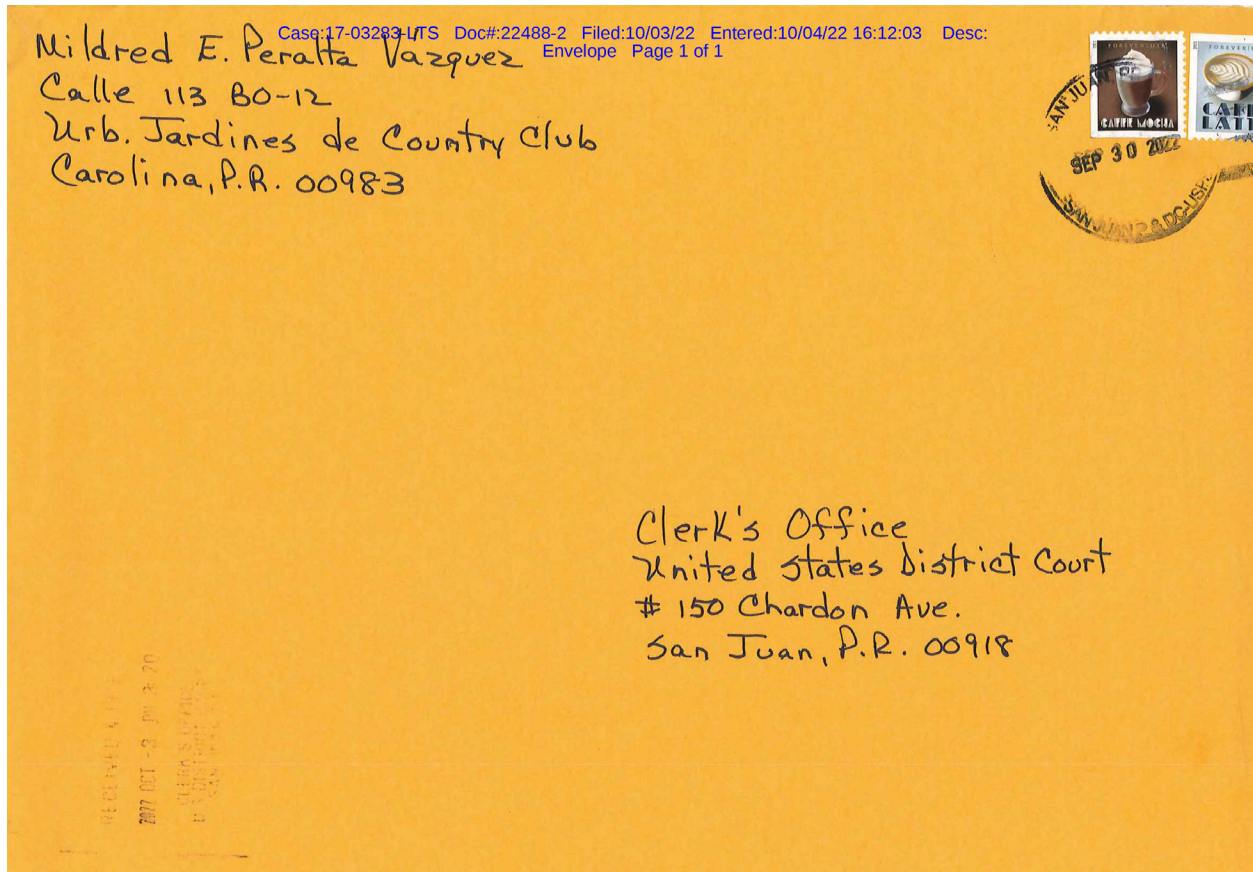
You reported that you agreed with the Authority's finding and that you acknowledge that the health condition that keeps you unable to work is not going to improve. In view of the foregoing, you are hereby informed that your employment relationship with the Authority will be terminated effective December 31, 2021. This termination will include the suspension of fringe benefits such as medical and other insurance. For all matters related to retirement, cancer insurance and contributions to AEELA, you should contact Mrs. Nancy Luquis at 787-946-0045 extension 4559.

The Authority thanks you for your years of service in the Legal Counsel's Office, as well as your commitment, professionalism, and dedication.

Cordially,

[Signature]  
Michelle Malavet Escudero  
Director of Human Resources  
and Labor Relations

Urb. Altamira, Calle Aldebarán 638, San Juan, PR00920 | PO Box 71361, San Juan, PR 00936-8461  
787.946.0045 | afv.pr.gov





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**A** 185 Clymer St. Brooklyn, NY 11211

### TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)  
TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **ECF 22488**

Signed this 23<sup>rd</sup> of January 2023



Verify at [www.atanet.org/verify](http://www.atanet.org/verify)

A handwritten signature in blue ink, appearing to read 'Andreea I. Boscor'.

Andreea I. Boscor

